

## **Calgon Carbon Corporation / Chemviron: Slavery and Human Trafficking 2024 Statement**

This statement is made in accordance with the requirements of s. 54 of the (UK) Modern Slavery Act 2015. It sets out the steps that Calgon Carbon Corporation, together with its Chemviron European organization, has undertaken during the 2024 financial year, ending on 31 December, and the measures it is currently applying to ensure that slavery and human trafficking is not taking place across the group's entities (including its UK subsidiary Chemviron Carbon Ltd. and its Belgian direct holding company, Chemviron S.A.), or in their respective supply chains. This statement will be updated annually.

### **WHO WE ARE**

#### **Organizational Structure and Activities**

Calgon Carbon Corporation, together with its Chemviron European organization, is a global leader in the manufacture, supply, and development of activated carbon, advanced and innovative treatment systems, and value-added technologies and services aimed at optimising production processes and supporting environmental protection. Calgon Carbon's industry-leading R&D facility is dedicated to advancing new technologies, enhancing service capabilities, and driving continuous process improvement. With decades of experience, we offer solutions that create value worldwide across key sectors such as energy storage, food and beverage, drinking water and wastewater treatment, odour control, and chemical and pharmaceutical manufacturing.

We manufacture a diverse range of activated carbon products, including pulverised, extruded and granular forms, as well as acid-washed and impregnated variants. These are used in a broad spectrum of air, gas, water and industrial process applications. We also market granular and powdered wood-based activated carbon, which are used in various applications including food and beverage, industrial, fine chemicals and pharmaceuticals.

Headquartered in Belgium, Chemviron employs approximately 450 people across Europe and operates a strong network of sales offices in Germany, France, Italy, Denmark, Sweden and the United Kingdom as well as an extensive network of agents and distributors worldwide.

Calgon Carbon Corporation and Chemviron are part of the Kuraray group, ultimately held by Kuraray Co., Ltd., a company publicly traded on the Tokyo stock-exchange with over 11.000 employees worldwide.

In the United-Kingdom, Chemviron operates a reactivation centre in Tipton (West Midlands), a specialty activated carbon manufacturing plant in Ashton-in-Makerfield (near Manchester), and the Chemviron Cloth Division (CCCD) near Newcastle, which produces Activated Carbon Cloth under the FLEXZORB® and ZORFLEX® brands, for a range of specialized applications.

#### **Our Supply Chain**

We maintain a wide range of relationships across our supply chain, including material suppliers, human resources partners (such as recruitment and interim staffing agencies), and various service providers and partners. These also include construction firms engaged in modernizing our facilities, as well as our network of agents and distributors who help sell our products.

### **OUR POLICY ON MODERN SLAVERY AND HUMAN TRAFFICKING**

- We have a "Combating Trafficking in Persons" policy in place, which outlines internal standards on this matter.
- In addition, we adhere to "Kuraray Corporate Statements", and we have a strict Code of Business Conduct & Ethics (the "Code of Conduct"), a Compliance Handbook and various internal policies that apply throughout the entire organisation. These documents promote ethical behaviour and establish the core values that guide our day-to-day conduct, including our relationships with partners throughout the supply chain. We provide regular trainings on the Code of Conduct throughout our locations both on-site and online.



- We are committed to complying with all the laws applicable to our business, including those related to labour, health and safety. This commitment extends to our employees as well as interim staff, external consultants and anyone entering our premises.
- We have a zero-tolerance policy toward modern slavery, human trafficking and child labour. We require all of our supply chain partners to share these values and fully comply with applicable laws in each and every country in which we operate.
- We do not enter into commercial relationships with any business known to be involved in slavery or human trafficking.

If Calgon Carbon Corporation/Chemviron reasonably believes or suspects that as supplier or any other partner is of involved in slavery, human trafficking, or child labour, the matter be thoroughly investigated. Calgon Carbon Corporation/Chemviron will take all necessary measures to resolve the issue and restore full compliance with applicable laws, including reporting misconducts to the relevant authorities

## **STATEMENT - WHAT WE ALWAYS DO AND DID IN 2024**

### *Our Employees*

- We comply with all applicable laws in the jurisdictions where we do business, including, but not limited to, employment, health, safety and human rights laws. This applies to permanent and temporary employees, as well as external consultants.
- We do not employ children or anyone below the minimum legal age for employment.
- We always enter into formal, lawful and fair employment relationships with all of our employees, whether temporary or permanent, and ensure they all have the legal right to work in the jurisdictions where they are employed.
- We declare all of our employees to the tax and employment authorities in every jurisdiction where we operate.
- We respect the right of employees to join or form trade unions.
- We maintain works councils in our European organizations, where both employees and Calgon Carbon Corporation/Chemviron are represented.
- We provide necessary and appropriate tools, equipment, protective gears, facilities and training to ensure our employees can perform their work safely and comfortably.
- We do not withhold employees' passports, work or residency permits, certificates, or authorisations. We do not coerce employees to stay in their roles against their will. Our employees are free to leave their employment, subject only to the compliance of their contractual and legal obligations.
- We regularly review employee records, both permanent and temporary, to ensure all documents are complete and confirm the employee's legal right and freedom to work with us.
- We provide training to our employees, Code of Conduct, Corporate Statement and Compliance Handbook at our UK locations, covering both UK and Nordic employees.

### *Our Recruitment and Interim Staffing Agencies*

- We do not allow our recruitment agencies to employ children or anyone below the legal minimum age for employment. We ensure that all temporary or interim staff are legally permitted to work in the jurisdictions where they will be employed or assigned.
- We declare all our employees to the tax and employment authorities in all applicable jurisdictions.
- If we have doubts about a candidate's eligibility or documentation, we consistently investigate and request additional evidence from our agencies, before proceeding with the hire.
- We provide all necessary and appropriate tools, safety equipment, gear, and facilities to ensure that our interim staff can perform their duties safely and comfortably.
- We disclose accurate and accessible information about our employment opportunities and prohibit any fraudulent practices during the recruitment process. We guarantee fair and equal treatment throughout the hiring process.
- We only partner with professional recruitment agencies that comply with all applicable employment laws.
- We do not charge candidates or recruits any recruitment fees of any kind.
- We regularly review our relationships with recruitment and interim agencies. Where necessary, we request specific commitments on the above matters, also through specific contract clauses.

### *Other Supply Chain Partners*

- We require all our partners to comply with all applicable laws, including, but not limited to, employment, health and safety, and human rights regulations.
- In 2024, extensive efforts were made to review and enhance the existing supplier's questionnaire, expanding its scope to cover additional so as to widen ethical topics, including modern slavery and human trafficking. We now have a single comprehensive questionnaire, comprising over 50 questions on a wide range of topics, including



human rights, social contribution, fair business practices, safety, and quality. This updated questionnaire was sent to 91 suppliers within Kuraray's Environmental Solutions Division, representing 80% of the global spend. We also conducted individual interviews with suppliers who did not meet our expected standards and agreed on appropriate action plans and remedial measures.

## STATEMENT - WHAT WE WILL DO

### **Compliance & Risk Assessment & Due Diligence**

#### *Internal Processes and Direct and Interim Employment*

- We will continue to review and further strengthen our compliance and risk management processes in relation to employment law, human rights, modern slavery, forced labour and the protection of vulnerable and exploited workers.

#### *Other Supply Chain Partners*

- Our UK business supply chain is global, and we expect our partners ideally to already have anti-slavery and human trafficking policies and procedures in place, or at the very least to comply with all applicable laws on employment, health, safety and human rights.
- During our supplier qualification process, we will continue to send to all of our worldwide activated carbon suppliers a quality questionnaire including ethics questions and confirmation statements about modern slavery, forced labour and human trafficking to all our worldwide activated carbon suppliers. For all other suppliers, we will include a similar statement in our new supplier's registration process.
- We will continue to conduct on-site checks and audits of our active carbon suppliers, with the number of audits expected to increase throughout 2025.
- We will continue to send questionnaires covering various topics, including human rights, social contribution, fair business procedures, safety, and quality across Kuraray's Environmental Solutions Division, to more than 120 supply chain partners representing at least 80% of the global spend. We have created a new simplified version of the questionnaire to send to new vendors, which will be introduced starting in early 2026.

#### *Agents and Distributors*

We will continue to send our Supplier Code of Conduct to all new agents and distributors who declare not to have one. In 2024, we sent 145 anticorruption compliance certificates to the agents and distributors we conducted business with. Going forward, we are also implementing a monitoring function to ensure that our agents and distributors remain in good standing.

### **Management, Communication and Monitoring Processes**

#### *Internal Processes and Direct and Interim Employment*

- We will ensure that all future agreements with agencies and relevant partners include clauses requiring compliance with employment law, respect for human rights and explicit prohibitions against modern slavery, forced labour, and human trafficking.
- We will communicate our policy internally to all employees, permanent, temporary and interim.
- We have reviewed and implemented a revised, and now global, whistleblowing policy, designed to encourage permanent and temporary employee, business partners and consultants to raise concerns through multiple channels. We have provided multi-lingual trainings, both onsite and online, throughout 2024 to explain how to submit complaints and we will keep doing it periodically.
- We are committed to complying with lawful requests for facility access in relation to the prevention of human trafficking and slavery.

#### *Other Supply Chain Partners*

- We will continue to monitor our supply chain partners by strengthening our evaluation procedures, ensuring they are subject to increasingly rigorous due diligence. As part of this enhanced oversight, we will require all commercial partners to operate in full alignment with our anti-slavery and human rights values, supported by clear expectations, ongoing assessments, and accountability measures.



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Reinier Keijzer, Managing Director ("administrateur-délégué")  
June 30, 2025